

FINAL DRAFT/PROPOSED CAAPP PERMIT
Prairie Packaging, Inc.
I.D. No.: 031012AEY
Application No.: 97030145
December 12, 2003

217/782-2113

"RENEWAL"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Prairie Packaging, Inc.
Attn: Gary Anderson
7207 South Mason Avenue
Bedford Park, Illinois 60638

<u>Application No.:</u> 97030145	<u>I.D. No.:</u> 031012AEY
<u>Applicant's Designation:</u>	<u>Date Received:</u> September 14, 2001
<u>Operation of:</u> Polystyrene Film and Foam Consumer Goods Manufacturing	
<u>Date Issued:</u> TO BE DETERMINED	<u>Expiration Date</u> ² : DATE
<u>Source Location:</u> 7207 South Mason Avenue, Bedford Park, Cook County	
<u>Responsible Official:</u> Gary Anderson, Facility Manager	

This permit is hereby granted to the above-designated Permittee to OPERATE a polystyrene film and foam consumer goods manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Dan Punzak at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:DGP:psj

cc: Illinois EPA, FOS, Region 1
USEPA

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit.

² Except as provided in condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Prairie Packaging, Inc.
7207 South Mason Avenue
Bedford Park, Illinois 60638
708/924-3700

I.D. No.: 031012AEY
Standard Industrial Classification: 3086, Plastic Foam Products

1.2 Owner/Parent Company

Prairie Packaging, Inc.
7207 South Mason Avenue
Bedford Park, Illinois 60638

1.3 Operator

Prairie Packaging, Inc.
7207 South Mason Avenue
Bedford Park, Illinois 60638

Gary Anderson, Facility Manager
708/924-3700

1.4 General Source Description

Prairie Packaging, Inc. is located at 7200 and 7207 South Mason Avenue in Bedford Park. The source manufactures polystyrene film and foam consumer goods (e.g., foam plates, plastic cups). The source consists an expanded polystyrene line and various supporting equipment. In addition to the expanded polystyrene lines, Prairie Packaging, Inc. has four hard polystyrene lines. Polystyrene pellets are added to the lines where they are melted under pressure, extruded through a product-specific die, and formed into the final product.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
ERMS	Emission Reduction Market System
°F	degrees Fahrenheit
hr	hour
HAP	Hazardous Air Pollutants
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
mmBtu	Million Btus
mo	month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
PSEU	Pollutant Specific Emission Unit
RMP	Risk Management Plan
RTO	Regenerative Thermal Oxidizer
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a) (1) and 201.211, as follows:

Injection Molding Machines

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a) (2) or (a) (3), as follows:

At 7207 South Mason Avenue

Polystyrene Storage Silos
Vacuum Loaders with Attached Filters^a
Fluff Bins
Expanded Polystyrene Line Grinders
Expanded Polystyrene Line Trim Presses
Expanded Polystyrene Line Thermoformers
Offline Foam and Chunk Grinder with Cyclone^a
Thermal Oxidizer Burners
Isopentane Storage Tank

At 7200 South Mason Avenue

Plastic Resin Blenders
Polystyrene Storage Silos
Plastic Straw Extrusion Lines
Railcar/Truck Unloaders with Sock Filter^a
Vacuum Conveyors
Cup Printers and Dryers
Off Line Grinder

^a These units have control equipment but the emissions in the absence of the control equipment are less than 0.44 tons/year.

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a) (4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than

1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Extruders used for the extrusion of metals, minerals, plastics, rubber, or wood, excluding extruders used in the manufacture of polymers, provided that volatile organic materials or class I or II substances subject to the requirements of Title VI of the CAA are not used as foaming agents or release agents or were not used as foaming agents in the case of extruders processing scrap material [35 IAC 201.210(a)(5)].

Die casting machines where a metal or plastic is formed under pressure in a die [35 IAC 201.210(a)(12)].

Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35

IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.2.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.2.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
EPL1	Expanded Polystyrene Line #1 (Includes Four Extruders)	November, 1991 (Modified, 2002)	Regenerative Thermal Oxidizer

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:
 - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.
 - b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 Operating Program for Particulate Matter

- a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

- c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

5.2.4 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.5 Risk Management Plan

- a. This stationary source, as defined in 40 CFR Section 68.3, is subject to 40 CFR Part 68, the Accidental Release Prevention regulations [40 CFR 68.215(a)(1)].
- b. The owner or operator of a stationary source shall revise and update the RMP submitted, as specified in 40 CFR 68.190.

5.2.6 Future Regulations

- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.7 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

- 5.3.1 This permit is issued based on the source not being subject to the NESHAP for Flexible Polyurethane Foam Production, 40 CFR 63 Subpart III, because flexible polyurethane foam, which is defined in 40 CFR 63.1292 as a flexible cellular polymer containing urea and carbonate linkages in the chain backbone produced by reacting a diisocyanate, polyol, and water, is not produced at the source.

- 5.3.2 This permit is issued based on the source not being subject to the NESHAP for Group IV Polymers and Resins, 40 CFR 63 Subpart JJJ, because the source does not manufacture poly(ethylene terephthalate) resin or polymers or copolymers comprised of at least 50 percent bis-(2-hydroxyethyl)-terephthalate by weight.
- 5.3.3 This permit is issued based on the source not being subject to the NSPS for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry, 40 CFR 60 Subpart DDD, because the source is not involved in the manufacture of polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate).

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

The amount of plastic cutlery products produced shall not exceed 1,095 tons/year. This limit is to assure that the injection molding machines qualify as insignificant emission units (See Condition 3.1.1). [T1]

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Nitrogen Oxides (NO _x)	----
Particulate Matter (PM)	1.16
Sulfur Dioxide (SO ₂)	----
Volatile Organic Material (VOM)	54.65
HAP, not included in VOM or PM	----
Total	55.81

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.
- b. The amount of plastic cutlery products produced (tons/calendar year).

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

The amount of plastic cutlery products produced exceeds 1,095 tons/calendar year.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

N/A

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
 - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 116 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 13.0894 tons per season.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.

iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

Not applicable.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and

- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
 - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

None

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: EPL #1 Expanded Polystyrene Line with Four Extruders
Control: Regenerative Thermal Oxidizer

7.1.1 Description

Extruded foams are produced from a mixture of polymer, a nucleating agent, and a blowing agent. These reagents are thoroughly mixed within the extruder and kept under high pressure until exiting through a die. As the "melt" emerges from the die, the change in pressure allows the blowing agent (isopentane) to expand, producing the foam's structure. The foam is rolled into sheets for use in the thermoformers. The thermoformers mold the sheets into a variety of final products. Approximately 48% of the extruded form is converted into final products. The remainder is recycled by the source through the use of grinders and repelletizers.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EPL1	Expanded Polystyrene Foam Line #1, Consisting of:	
	Four Foam Extruders with Capture Equipment	RTO ^a
	Three Repelletizers with Capture Equipment	RTO
	Grinding Area with Capture Equipment	RTO
	Roll Storage Area	None
	Five Thermoformers	None

^a Regenerative Thermal Oxidizer

7.1.3 Applicability Provisions and Applicable Regulations

- Expanded Polystyrene Line #1 is "affected polystyrene line" for the purpose of these unit-specific conditions.
- The affected polystyrene lines are subject to 35 IAC 218 Subpart G, Use of Organic Material, which provides that:

- i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.1.3(b)(ii) (see also 35 IAC 218.302) and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material [35 IAC 218.301].
 - ii. Emissions of organic material in excess of those permitted by Condition 7.1.3(b)(i) (see also 35 IAC 218.301) are allowable if such emissions are controlled by flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 218.302(a)].
- c. The affected polystyrene lines are subject to 35 IAC 218.986(a), which provides that every owner or operator of an emission unit subject to 35 IAC 218 Subpart TT shall employ emission capture and control equipment which achieves an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit [35 IAC 218.986(a)].

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected polystyrene lines are not subject to the NESHAP for Flexible Polyurethane Foam Production, 40 CFR 63 Subpart III, because flexible polyurethane foam, which is defined in 40 CFR 63.1292 as a flexible cellular polymer containing urea and carbonate linkages in the chain backbone produced by reacting a diisocyanate, polyol, and water, is not produced on the affected polystyrene lines.
- b. The affected polystyrene lines are not subject to the NESHAP for Group IV Polymers and Resins, 40 CFR 63 Subpart JJJ, pursuant to 40 CFR 60.1310(d)(4), which exempts finishing processes including equipment such as compounding units, spinning units, drawing units, extruding units, and other finishing step from the definition of an affected source.
- c. The affected polystyrene lines are not subject to the NSPS for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry, 40 CFR 60 Subpart DDD, because the affected polystyrene lines are not involved in the manufacture of polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate).

- d. Pursuant to the applicability requirements of 35 IAC 218 Subpart TT, as described in 35 IAC 218.980(f), the control requirements only apply to the grinding area and repelletizers but the Permittee has chosen to voluntarily control the foam extruders.
- e. 35 IAC 218.107 allows afterburners (e.g., the thermal oxidizer) to be shutdown in the winter (November 1 to March 31) if the afterburner is only used to comply with Part 218. However, the afterburner used by the Permittee is required to operate year around in order to comply with the limits established pursuant to Part 203.

7.1.5 Operational and Production Limits and Work Practices

- a. The afterburner combustion chambers shall be preheated to the manufacturer's recommended temperature but not lower than 1400°F, before the affected polystyrene lines are started up, and this temperature shall be maintained during operation of the affected polystyrene lines.
- b. The Permittee shall follow good operating practices for the oxidizer, including periodic inspection, routine maintenance and prompt repair of defects.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected polystyrene lines are subject to the following:

- a. Operation, production and emissions of the two expanded polystyrene line shall not exceed the following lines:

	Total	
	(Lb/Mo)	(Ton/Yr)
Isopentane Usage	225,132	900.6
Total VOM Emissions	12,250	49.0

These limits are based on a minimum 91% overall control efficiency of the oxidizer for all operations, the maximum total foam production, the maximum total isopentane usage, 48% of the foam produced is finished product in which 84.6% of the initial isopentane used is retained in the final product and not emitted, a maximum 5.0% by weight of the blowing agent input into the product for four extruders, a maximum of 52% of the foam produced is scrap which is recycled, and 0% of the initial

isopentane used is retained in the scrap after it is processed and prior to it being reintroduced to the extruder. Compliance with these limits shall be determined from a running total of 12 month of data for annual limits and a 12-month rolling average for monthly limits. [T1]

- b. The above limitations contain revisions to previously issued Permit 97010034. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the scrap usage limit has been deleted although internally the value is kept in order to make the VOM calculation.

7.1.7 Testing Requirements

Pursuant to 35 IAC 218.988(a), when in the opinion of the Illinois EPA it is necessary to conduct testing to demonstrate compliance with Condition 7.1.3(c) (see also 35 IAC 218.986), the owner or operator of a VOM emission unit subject to the requirements of 35 IAC 218 Subpart TT shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105, as follows:

- a. For control device efficiency testing and monitoring, the control device efficiency shall be determined by simultaneously measuring the inlet and outlet gas phase VOM concentrations and gas volumetric flow rates in accordance with the gas phase test methods specified in Condition 7.1.7(c) (see also 35 IAC 218.105(f)) [35 IAC 218.105(d) (1)].
- b. The overall efficiency of the emission control system shall be determined as the product of the capture system efficiency and the control device efficiency or by the liquid/liquid test protocol as specified in

40 CFR 60.433 for each solvent recovery system. In those cases in which the overall efficiency is being determined for an entire line, the capture efficiency used to calculate the product of the capture and control efficiency is the total capture efficiency over the entire line [35 IAC 218.105(e)(1)].

- c. Volatile Organic Material Gas Phase Source Test
Methods: The methods in 40 CFR Part 60, Appendix A, delineated below shall be used to determine control device efficiencies:
- i. CFR Part 60, Appendix A, Method 18, 25 or 25A, as appropriate to the conditions at the site, shall be used to determine VOM concentration. Method selection shall be based on consideration of the diversity of organic species present and their total concentration and on consideration of the potential presence of interfering gases. The test shall consist of three separate runs, each lasting a minimum of 60 min, unless the Illinois EPA and the USEPA determine that process variables dictate shorter sampling times [35 IAC 218.105(e)(1)];
 - ii. CFR Part 60, Appendix A, Method 1 or 1A, shall be used for sample and velocity traverses [35 IAC 218.105(e)(2)];
 - iii. CFR Part 60, Appendix A, Method 2, 2A, 2C or 2D, shall be used for velocity and volumetric flow rates [35 IAC 218.105(e)(3)];
 - iv. CFR Part 60, Appendix A, Method 3, shall be used for gas analysis [35 IAC 218.105(e)(4)];
 - v. CFR Part 60, Appendix A, Method 4, shall be used for stack gas moisture [35 IAC 218.105(e)(5)];
 - vi. CFR Part 60, Appendix A, Methods 2, 2A, 2C, 2D, 3 and 4, shall be performed, as applicable, at least twice during each test run [35 IAC 218.105(e)(6)]; and
 - vii. Use of an adaptation to any of the test methods specified in Conditions 7.1.7(c)(i), (ii) (iii), (iv), (v), and (vi) (see also 35 IAC 218.105(f)(1), (2), (3), (4), (5) and (6)) may not be used unless approved by the Illinois EPA and the USEPA on a case by case basis. An owner or operator must submit sufficient documentation for the Illinois EPA

and the USEPA to find that the test methods specified in Conditions 7.1.7(c)(i), (ii) (iii), (iv), (v), and (vi) (see also 35 IAC 218.105(f)(1), (2), (3), (4), (5) and (6)) will yield inaccurate results and that the proposed adaptation is appropriate [35 IAC 218.105(e)(7)].

7.1.8 Monitoring Requirements

- a. Pursuant to 35 IAC 218.105(d)(2)(A)(i), an owner or operator that uses an afterburner to comply with Condition 7.1.3(c) (see also 35 IAC 218 Subpart TT) shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. The continuous monitoring equipment must monitor for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner. The thermal oxidizer is an afterburner.

- b. Compliance Assurance Monitoring (CAM) Requirements

The affected regenerative thermal oxidizer is subject to 40 CFR Part 63, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 6 pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. The Permittee shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information, as required by 40 CFR 64.9(b)(1).

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected polystyrene line to demonstrate compliance with Conditions 5.5.1, 7.1.3, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the testing of the efficiency of each capture system and control device pursuant to Condition 7.1.7, which include the following [Section 39.5(7)(e) of the Act]:
 - i. The date, place and time of sampling or measurements;

- ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of such analyses; and
 - vi. The operating conditions as existing at the time of sampling or measurement.
- b. Pursuant to 35 IAC 218.991(a)(2), any owner or operator of a VOM emission unit which is subject to the requirements of 35 IAC 218 Subpart TT and complying by the use of emission capture and control equipment shall collect and record all of the following information each day and maintain the information at the source for a period of three years:
- i. Control device (thermal oxidizer) monitoring data [35 IAC 218.991(a)(2)(A)];
 - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission unit [35 IAC 218.991(a)(2)(B)]; and
 - iii. A maintenance log for the capture system, control device (thermal oxidizer) and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages [35 IAC 218.991(a)(2)(C)].
- c. Records addressing use of good operating practices for the regenerative thermal oxidizer:
- i. Records for periodic inspection of the thermal oxidizer with date, individual performing the inspection, and nature of inspection; and
 - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- d. Isopentane usage for the affected polystyrene line, lb/mo and ton/yr;
- e. The aggregate monthly and annual VOM emissions from the affected polystyrene lines based on the isopentane usage, and thermal oxidizer efficiency, with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected polystyrene line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. The owner or operator of a subject VOM emission unit shall notify the Illinois EPA of any violation of the requirements of Condition 7.1.3(c) (see also 35 IAC 218 Subpart TT) by sending a copy of any record showing a violation to the Agency within 30 days following the occurrence of the violation [35 IAC 218.991(a)(3)(A)].
- b. Emissions of VOM in excess of the limits in Conditions 7.1.3(b) or 7.1.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.
- c. Reporting of Compliance Assurance Monitoring (CAM)

The Permittee shall submit monitoring reports to the Illinois EPA in accordance with Condition 8.6.1 and shall include, at a minimum, the information required under Condition 8.6.1 and the following information [40 CFR 64.6(c)(3), 64.9(a)(1), and (2)]:

- i. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken [40 CFR 64.6(c)(3) and 64.9(a)(2)(i)]; and
- ii. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks [40 CFR 64.6(c)(3) and 64.9(a)(2)(ii)].

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

- a. Compliance with Conditions 7.1.3(b) and (c) is assumed by proper operation of the regenerative

thermal oxidizer, as addressed by Conditions 7.1.5(b) and 7.1.8.

- b. To determine compliance with Conditions 5.5.1 and 7.1.6, VOM emissions from the affected polystyrene lines shall be calculated based on the following:

Volatile Organic Material Emissions:

$$\text{VOM (lb)} = [(\text{VOM from Product, lb}) + (\text{VOM from Scrap, lb})] \times [1 - (\text{Oxidizer Efficiency}^* (\%)/100)]$$

Where:

$$\begin{aligned} \text{VOM from Product (lb)} &= (\text{Amount of Foam Produced, lb}) \\ &\times (\% \text{ of Production Converted to Finished Product}/100) \\ &\times [(\text{Isopentane Content of Foam, } (\%)/100)] \times [1 - \\ &(\text{Retention of Isopentane in Final Product, } (\%)/100)] \end{aligned}$$
$$\begin{aligned} \text{VOM from Scrap (lb)} &= (\text{Amount of Foam Produced, lb}) \times \\ &(\% \text{ of Scrap}/100) \times [(\text{Isopentane Content of Foam, } \\ &(\%)/100)] \end{aligned}$$

*As specified by manufacturer or vendor of the regenerative thermal oxidizer or by testing pursuant to Condition 7.1.7

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____ (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;

- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

- 9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].
- 9.1.2 In particular, this permit does not alter or affect the following:
 - a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
 - d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.
- 9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15) (a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15) (b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7) (o) (v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7) (i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.2 Attachment 2 - Preliminary Baseline Emissions Summary

Seasonal VOM emissions from excluded units, in tons/season (TPS):

<u>Emission Unit</u>	<u>Proposed</u>	<u>Illinois EPA Determination</u>
Expanded Polystyrene Foam Lines 1 and 2	<u>13.0894</u>	<u>13.0894</u>
Total:	13.0894	13.0894

The source shall maintain records of actual seasonal VOM emissions for all emission units not considered insignificant activities in accordance with the recordkeeping and compliance procedures identified in the CAAPP permit starting with the 1998 seasonal allotment period of May 1 through September 30. The source shall submit the seasonal emissions information, as a component of the Annual Emissions Report by November 30 of each year, pursuant to 35 IAC 205.300.

TOTAL SOURCE ALLOTMENT = 0.88 x 13.0894 = 11.5187 TPS

OR 116 ATU

1 ATU equals 200 lbs of VOM [35 IAC 205.130], or using standard conversion rate of 2000 lbs per ton, 10 ATUs equals 1 ton.

DGP:psj

10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
 - Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.
2. Minor Permit Modification
 - Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. number:
	Permit number:
Date received:	

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits?		<input type="checkbox"/> Yes <input type="checkbox"/> No
6. Township name:	7. County:	8. ID number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?
<input type="checkbox"/> Yes <input type="checkbox"/> No	
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?
<input type="checkbox"/> Yes <input type="checkbox"/> No	
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?
<input type="checkbox"/> Yes <input type="checkbox"/> No	
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?
<input type="checkbox"/> Yes <input type="checkbox"/> No	
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.
<input type="checkbox"/> Yes <input type="checkbox"/> No	
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application	

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized signature:	
BY:	_____
	AUTHORIZED SIGNATURE
	TITLE OF SIGNATORY
	_____/_____/_____
	TYPED OR PRINTED NAME OF SIGNATORY
	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.5 Attachment 5 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

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10.6 Attachment 6 - Compliance Assurance Monitoring (CAM) Plan

Table 1 - PSEU Designation: Expanded Polystyrene Line
Pollutant: VOM

Indicators: #1: RTO Combustion Chamber
Temperature by Thermocouple
#2: Equipment and Work Practice

General Criteria

The Monitoring Approach Used to Measure The Indicators:	Continuous recording of combustion chamber temperature on chart recorder	Periodic Inspection and Maintenance of Burner
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Maintain combustion temperature of 1400°F when line is in operation and capture equipment is in place	N/A
Quality Improvement Plan (QIP) Threshold Levels:	Exceedance of the lower operating limit to less than 5% of operating time, and no more than 50°F below set point	N/A

Performance Criteria

The Specifications for Obtaining Representative Data:	Thermocouples (with spares) are installed in the combustion chamber of the oxidizer in accordance with the manufacturers specifications	N/A
Verification Procedures to Confirm the Operational Status of the Monitoring:	At the time of installation, the manufacturer confirmed the operation and calibrated the primary and spare thermocouples, span and zero checks.	N/A
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	Periodic calibration and span and zero checks will be conducted in accordance with manufacturers specifications, readings before and after will be recorded and logged. Calibration performed annually.	N/A
The Monitoring Frequency:	Continuous monitoring of temperature by chart recorder.	Annual Burner Inspection

The Data Collection Procedures that Will be Used:	Combustion temperature will be continuously recorded on a chart recorder and charts will be preserved for 5 years.	Record results of annual inspection
The Data Averaging Period for Determining Whether an Excursion or Exceedance has Occurred:	Data averaging period will be three consecutive hours	N/A

I. INTRODUCTION

This source has applied for a renewal of its Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Prairie Packaging, Inc. is located at 7200 and 7207 South Mason Avenue in Bedford Park. The source manufactures polystyrene film and foam consumer goods (e.g., foam plates, plastic cups). The source consists an expanded polystyrene line and various supporting equipment. In addition to the expanded polystyrene lines, Prairie Packaging, Inc. has four hard polystyrene lines. Polystyrene pellets are added to the lines where they are melted under pressure, extruded through a product-specific die, and formed into the final product.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
EPL1	Expanded Polystyrene Line #1 (Includes Four Extruders)	November, 1991 (Modified, 2002)	Regenerative Thermal Oxidizer

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Nitrogen Oxides (NO _x)	----
Particulate Matter (PM)	1.16
Sulfur Dioxide (SO ₂)	----
Volatile Organic Material (VOM)	54.65
HAP, not included in VOM or PM	----
Total	55.81

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in

a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit.

The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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